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November 18, 2015

## **VIA ECF AND E-MAIL**

The Honorable Analisa Torres, U.S.D.J.
United States District Court, Southern District of New York
500 Pearl Street
Courtroom 15D
New York, New York 10007

Re: Corey Leach et al. v. Fox Entertainment Group, et al., Case No. 15-CV-07208 (AT)

## Dear Judge Torres:

We represent Defendant Warner Bros. Television, a division of WB Studio Enterprises Inc. ("Warner Bros.") (incorrectly identified in this action as "Warner Bros. Entertainment Inc.")<sup>1</sup> and Bonanza Productions Inc. ("Bonanza") in the above-referenced matter. We write, pursuant to Your Honor's Individual Practices in Civil Cases Rule I(D), to respectfully request that the Court so order the parties' agreed-to extension of time to respond to the Second Amended Class and Collective Action Complaint ("Second Amended Complaint") (Docket No. 66), which was filed with the Court on November 17, 2015, as follows:

• The deadline for Defendant Warner Bros. to answer, move or otherwise respond to the Second Amended Complaint is 60 days from the date on which Plaintiff sends the undersigned counsel for Warner Bros. a Waiver of Service with respect to the Second Amended Complaint.

<sup>&</sup>lt;sup>1</sup> Plaintiffs have incorrectly identified Warner Bros. Entertainment Inc. ("Warner Bros. Entertainment") in their Second Amended Complaint. By filing this letter, we do not concede, and reserve all rights to contest, that Warner Bros. Entertainment is a proper defendant in this action, and to move to dismiss Warner Bros. Entertainment from this action if not voluntarily dismissed. At this time, the parties are in the process of conferring and are attempting to work cooperatively to identify the proper corporate entities to be named in this action. We reserve any and all rights to move to dismiss any corporate entities who are improperly named.

Honorable Analisa Torres November 18, 2015 Page 2

• The deadline for Defendants Bonanza and Cast & Crew Payroll to answer, move or otherwise respond to the Second Amended Complaint is extended to December 20, 2015 (unless new Waivers of Service are issued with respect to the Second Amended Complaint, in which case the deadline would be 60 days from the date the Waivers are issued). Currently, Defendants Bonanza and Cast & Crew Payroll's time to answer, move or otherwise respond to the <u>initial</u> Complaint is November 20, 2015.

We have conferred with Plaintiffs' counsel, who has agreed to these deadlines. No prior requests for an extension have been made. Therefore, we respectfully request that the Court approve the agreed-upon schedule as set forth above.

Thank you for your consideration.

Sincerely,

/s Amanda N. Slatin

Amanda N. Slatin

Counsel for Warner Bros. and Bonanza

cc: James Vagnini, Counsel for Plaintiffs (via ECF)

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GRANTED to the extent that Defendants must answer the complaint or submit a letter requesting a pre-motion conference pursuant to Paragraph III of this Court's Individual Practices in Civil Cases by the agreed-upon deadlines above.

SO ORDERED.

Dated: November 18, 2015 New York, New York

> ANALISA TORRES United States District Judge